

EXHIBIT 6

From: [Lai Yip](#)
To: [Rena Andoh](#); [Goeke, Justine](#); [Samplin, Ilissa](#); [Dominguez, Kate](#)
Cc: [Travis Anderson](#); [Polka, Michael M.](#); [Kazim Naqvi](#); [Robert J. Fluskey](#); [Melissa N. Subjeck](#); [Pauline T. Muto](#); [Krevitt, Josh](#); [Kaounis, Angelique](#); [tflynn@harrisbeach.com](#); [*** Skyrise-Trade Secrets Litigation - External](#); [James Fazio](#); [Miller, Rory](#); [Mullen, Will](#); [Popham, Mitchell](#)
Subject: RE: Moog vs. Skyrise, et al
Date: Monday, April 18, 2022 9:16:26 PM

[WARNING: External Email]

Counsel,

We write to follow up regarding the parties' dispute as to the inspection protocol. We have conferred with our client regarding what the parties discussed on Friday's meet and confer, and we are willing to provide a privilege review inspection period for Defendants before the forensic images are made available to Moog. (I.e., the privilege issue would not be solely addressed through a presumptive privilege filter.) To that end, we would propose adding the following provision as (new) Section III.A.5 in our proposed protocol:

Privilege Review. Before the forensic images are made available to Authorized Reviewers (as defined below) of Receiving Parties to inspect, the Producing Party shall have an opportunity review the forensic images for privileged materials and work with iDS to excise those from the forensic image within a prompt amount of time after entry of this Addendum, on a rolling basis in order to prevent undue delay. Any materials excised from the forensic images must be identified by the Producing Party to the Receiving Parties with reasonable particularity in a log, so that the Receiving Parties may have an opportunity to object to the excision of the materials. The Parties shall meet and confer to come to an agreement regarding the timing of the activities identified in this Paragraph. Under no circumstances shall the activities in this Paragraph be used to unduly delay the proceedings.

Please let us know if this adequately addresses your privilege concerns. Also, you represented on Friday's meet and confer that you would relay our discussions back to your client and determine whether any agreements can be reached. Please let us know if you have an update in that respect.

Regards,

Lai L. Yip
+1 415-774-3147 | direct
LYip@sheppardmullin.com | [Bio](#)

SheppardMullin

Four Embarcadero Center, 17th Floor
San Francisco, CA 94111-4109
+1 415-434-9100 | main
www.sheppardmullin.com | [LinkedIn](#) | [Twitter](#)

From: Rena Andoh <RAndoh@sheppardmullin.com>
Sent: Monday, April 18, 2022 6:16 PM

To: Goeke, Justine <JGoeke@gibsondunn.com>; Lai Yip <LYip@sheppardmullin.com>; Samplin, Ilissa <ISamplin@gibsondunn.com>; Dominguez, Kate <KDominguez@gibsondunn.com>
Cc: Travis Anderson <TAnderson@sheppardmullin.com>; Polka, Michael M. <MPolka@gibsondunn.com>; Kazim Naqvi <KNaqvi@sheppardmullin.com>; Robert J. Fluskey <RFluskey@hodgsonruss.com>; Melissa N. Subjeck <MSubjeck@hodgsonruss.com>; Pauline T. Muto <pmuto@hodgsonruss.com>; Krevitt, Josh <JKrevitt@gibsondunn.com>; Kaounis, Angelique <AKaounis@gibsondunn.com>; tflynn@harrisbeach.com; *** Skyrise-Trade Secrets Litigation - External <Skyrise-TradeSecretsLitigation@gibsondunn.com>; James Fazio <JFazio@sheppardmullin.com>; Miller, Rory <Rory.Miller@lockelord.com>; Mullen, Will <William.Mullen@lockelord.com>; Popham, Mitchell <MPopham@lockelord.com>
Subject: RE: Moog vs. Skyrise, et al

Justine and Rory,

Please see the attached redline against the version Justine sent on Saturday evening. Please note that I've made changes to the provisions relating to both Skyrise and the individual defendants with respect to AEO materials, as well as modifications to the undertaking. Happy to discuss if productive.

Regards,
Rena

Rena Andoh

+1 212-634-3092 | direct

RAndoh@sheppardmullin.com | [Bio](#)

SheppardMullin

30 Rockefeller Plaza

New York, NY 10112-0015

+1 212-653-8700 | main

www.sheppardmullin.com | [LinkedIn](#) | [Twitter](#)

From: Goeke, Justine <JGoeke@gibsondunn.com>

Sent: Saturday, April 16, 2022 6:23 PM

To: Rena Andoh <RAndoh@sheppardmullin.com>; Lai Yip <LYip@sheppardmullin.com>; Samplin, Ilissa <ISamplin@gibsondunn.com>; Dominguez, Kate <KDominguez@gibsondunn.com>

Cc: Travis Anderson <TAnderson@sheppardmullin.com>; Polka, Michael M. <MPolka@gibsondunn.com>; Kazim Naqvi <KNaqvi@sheppardmullin.com>; Robert J. Fluskey <RFluskey@hodgsonruss.com>; Melissa N. Subjeck <MSubjeck@hodgsonruss.com>; Pauline T. Muto <pmuto@hodgsonruss.com>; Krevitt, Josh <JKrevitt@gibsondunn.com>; Kaounis, Angelique <AKaounis@gibsondunn.com>; tflynn@harrisbeach.com; *** Skyrise-Trade Secrets Litigation - External <Skyrise-TradeSecretsLitigation@gibsondunn.com>; James Fazio <JFazio@sheppardmullin.com>; Miller, Rory <Rory.Miller@lockelord.com>; Mullen, Will <William.Mullen@lockelord.com>; Popham, Mitchell <MPopham@lockelord.com>

Subject: RE: Moog vs. Skyrise, et al

Counsel,

As discussed on Friday's meet-and-confer, we have prepared the attached redline of the proposed protective order, which reflects Skyrise's revisions. In an effort to narrow disputes in advance of Tuesday's joint letter filing deadline, we would ask that you circulate any proposed edits to the attached by Monday at 6:00 p.m. EST. Please let us know if further discussion on the protective order would be productive.

Regards,

Justine Goeke

Justine Goeke (*she/her/hers*)

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
200 Park Avenue, New York, NY 10166-0193
Tel +1 212.351.5372 • Fax +1 212.817.9472
JGoeke@gibsondunn.com • www.gibsondunn.com

From: Rena Andoh <RAndoh@sheppardmullin.com>
Sent: Thursday, April 14, 2022 5:49 PM
To: Lai Yip <LYip@sheppardmullin.com>; Samplin, Ilissa <ISamplin@gibsondunn.com>; Dominguez, Kate <KDominguez@gibsondunn.com>
Cc: Travis Anderson <TAnderson@sheppardmullin.com>; Polka, Michael M. <MPolka@gibsondunn.com>; Kazim Naqvi <KNaqvi@sheppardmullin.com>; Robert J. Fluskey <RFluskey@hodgsonruss.com>; Melissa N. Subjeck <MSubjeck@hodgsonruss.com>; Pauline T. Muto <pmuto@hodgsonruss.com>; Krevitt, Josh <JKrevitt@gibsondunn.com>; Goeke, Justine <JGoeke@gibsondunn.com>; Kaounis, Angelique <AKaounis@gibsondunn.com>; tflynn@harrisbeach.com; *** Skyrise-Trade Secrets Litigation - External <Skyrise-TradeSecretsLitigation@gibsondunn.com>; James Fazio <JFazio@sheppardmullin.com>; Miller, Rory <Rory.Miller@lockelord.com>; Mullen, Will <William.Mullen@lockelord.com>; Popham, Mitchell <MPopham@lockelord.com>
Subject: RE: Moog vs. Skyrise, et al

[WARNING: External Email]

Ilissa,

I'm copying in counsel for the individual defendants to this chain to confirm that at least one of them can be on this call to discuss the forensic firm protocol. Even though these issues may dominantly impact Skyrise as a corporate defendant, all defendants will need to sign onto any protocols in the case. I'm also re-attaching Lai's letter to ensure that Locke Lord has seen it because it appears they were not on the email chain previously.

Second, attached is our redline of the last PO draft Gibson Dunn sent us for review. Rory – please

note that I made some minor edits to the language you proposed on Friday in the AEO section in order to accommodate the provision I drafted to address Skyrise.

I suggest that if we are not in agreement on the PO based on this draft, we also address those issues on tomorrow's call for efficiency.

Regards,
Rena

Rena Andoh

+1 212-634-3092 | direct

RAndoh@sheppardmullin.com | [Bio](#)

SheppardMullin

30 Rockefeller Plaza

New York, NY 10112-0015

+1 212-653-8700 | main

www.sheppardmullin.com | [LinkedIn](#) | [Twitter](#)

From: Lai Yip <LYip@sheppardmullin.com>

Sent: Thursday, April 14, 2022 5:17 PM

To: Samplin, Ilissa <ISamplin@gibsondunn.com>; Dominguez, Kate
<KDominguez@gibsondunn.com>; Rena Andoh <RAndoh@sheppardmullin.com>

Cc: Travis Anderson <TAnderson@sheppardmullin.com>; Polka, Michael M.
<MPolka@gibsondunn.com>; Kazim Naqvi <KNaqvi@sheppardmullin.com>; Robert J. Fluskey
<RFluskey@hodgsonruss.com>; Melissa N. Subjeck <MSubjeck@hodgsonruss.com>; Pauline T. Muto
<pmuto@hodgsonruss.com>; Krevitt, Josh <JKrevitt@gibsondunn.com>; Goeke, Justine
<JGoeke@gibsondunn.com>; Kaounis, Angelique <AKaounis@gibsondunn.com>;
tflynn@harrisbeach.com; *** Skyrise-Trade Secrets Litigation - External <Skyrise-TradeSecretsLitigation@gibsondunn.com>; James Fazio <JFazio@sheppardmullin.com>

Subject: RE: Moog vs. Skyrise, et al

Ilissa,

10 a.m. Pacific tomorrow works for me. Please use the following call-in:

Click: <https://sheppardmullin.zoom.us/j/5243471866?pwd=b1lRcjBhVGZyZsUldtYzg4Ui9TUT09>

Meeting ID: 524 347 1866

Passcode: 168860

Dial:

US: 877 853 5247

US: 888 788 0099

Meeting ID: 524 347 1866

Passcode: 168860

Regards,

Lai L. Yip

+1 415-774-3147 | direct

LYip@sheppardmullin.com | [Bio](#)

SheppardMullin

Four Embarcadero Center, 17th Floor

San Francisco, CA 94111-4109

+1 415-434-9100 | main

www.sheppardmullin.com | [LinkedIn](#) | [Twitter](#)

From: Samplin, Ilissa <ISamplin@gibsondunn.com>

Sent: Thursday, April 14, 2022 10:15 AM

To: Lai Yip <LYip@sheppardmullin.com>; Dominguez, Kate <KDominguez@gibsondunn.com>; Rena Andoh <RAndoh@sheppardmullin.com>

Cc: Travis Anderson <TAnderson@sheppardmullin.com>; Polka, Michael M.

<MPolka@gibsondunn.com>; Kazim Naqvi <KNaqvi@sheppardmullin.com>; Robert J. Fluskey

<RFluskey@hodgsonruss.com>; Melissa N. Subjeck <MSubjeck@hodgsonruss.com>; Pauline T. Muto

<pmuto@hodgsonruss.com>; Krevitt, Josh <JKrevitt@gibsondunn.com>; Goeke, Justine

<JGoeke@gibsondunn.com>; Kaounis, Angelique <AKaounis@gibsondunn.com>;

tflynn@harrisbeach.com; *** Skyryse-Trade Secrets Litigation - External <[Skyryse-](mailto:Skyryse-TradeSecretsLitigation@gibsondunn.com)

TradeSecretsLitigation@gibsondunn.com>

Subject: RE: Moog vs. Skyryse, et al

Lai,

Thank you for your letter. Are you available for a meet and confer tomorrow? Between 9 and 11 am PT would be best for me.

Thank you,

Ilissa

Ilissa Samplin

GIBSON DUNN

Gibson, Dunn & Crutcher LLP

333 South Grand Avenue, Los Angeles, CA 90071-3197

Tel +1 213.229.7354 • Fax +1 213.229.6354

ISamplin@gibsondunn.com • www.gibsondunn.com

From: Lai Yip <LYip@sheppardmullin.com>

Sent: Wednesday, April 13, 2022 9:39 PM

To: Dominguez, Kate <KDominguez@gibsondunn.com>; Rena Andoh <RAndoh@sheppardmullin.com>

Cc: Travis Anderson <TAnderson@sheppardmullin.com>; Polka, Michael M.

<MPolka@gibsondunn.com>; Kazim Naqvi <KNaqvi@sheppardmullin.com>; Robert J. Fluskey

<RFluskey@hodgsonruss.com>; Melissa N. Subjeck <MSubjeck@hodgsonruss.com>; Pauline T. Muto

<pmuto@hodgsonruss.com>; Samplin, Ilissa <ISamplin@gibsondunn.com>; Krevitt, Josh <JKrevitt@gibsondunn.com>; Goeke, Justine <JGoeke@gibsondunn.com>; Kaounis, Angelique <AKaounis@gibsondunn.com>; tflynn@harrisbeach.com; *** Skyrise-Trade Secrets Litigation - External <Skyrise-TradeSecretsLitigation@gibsondunn.com>
Subject: RE: Moog vs. Skyrise, et al

[WARNING: External Email]

Counsel, please see the attached letter.

Regards,

Lai L. Yip

+1 415-774-3147 | direct

LYip@sheppardmullin.com | [Bio](#)

SheppardMullin

Four Embarcadero Center, 17th Floor

San Francisco, CA 94111-4109

+1 415-434-9100 | main

www.sheppardmullin.com | [LinkedIn](#) | [Twitter](#)

From: Dominguez, Kate <KDominguez@gibsondunn.com>

Sent: Tuesday, April 12, 2022 1:25 PM

To: Rena Andoh <RAndoh@sheppardmullin.com>

Cc: Travis Anderson <TAnderson@sheppardmullin.com>; Lai Yip <LYip@sheppardmullin.com>; Polka, Michael M. <MPolka@gibsondunn.com>; Kazim Naqvi <KNaqvi@sheppardmullin.com>; Robert J. Fluskey <RFluskey@hodgsonruss.com>; Melissa N. Subjeck <MSubjeck@hodgsonruss.com>; Pauline T. Muto <pmuto@hodgsonruss.com>; Samplin, Ilissa <ISamplin@gibsondunn.com>; Krevitt, Josh <JKrevitt@gibsondunn.com>; Goeke, Justine <JGoeke@gibsondunn.com>; Kaounis, Angelique <AKaounis@gibsondunn.com>; tflynn@harrisbeach.com; *** Skyrise-Trade Secrets Litigation - External <Skyrise-TradeSecretsLitigation@gibsondunn.com>

Subject: RE: Moog vs. Skyrise, et al

Rena,

On the call with the court on Friday, Skyrise agreed to provide Moog the relief referenced in Moog's third enumerated request to the Court (requesting certain written information) within seven days—namely by this Friday, April 15. We are making every effort to provide that information sooner, and will endeavor to provide it by tomorrow, as you request, if we are able. We will also include information regarding our search for “Moog” hits as you request below.

With respect to the AEO provision in the protective order, Skyrise's issues with Moog's proposal were not limited to the need for adequate deposition preparation alone. As we explained to the court on the Friday teleconference, Skyrise must be allowed to prepare its defenses, and as part of that effort is entitled to show relevant information to individuals who have already seen that information. To that end, attached is a redline draft of the Protective Order with our proposed edits.

As for Moog's proposed forensic proposal, it is totally contrary to what was agreed in the March 11 Order. Moog's proposal would improperly permit Moog's outside counsel and experts unfettered access to review Skyrise's information, including potentially privileged information, just as if the information had been handed directly to Moog. That type of access is antithetical to the entire purpose of neutral forensic firm and is not acceptable to Skyrise.

Regards,

Kate Dominguez

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
200 Park Avenue, New York, NY 10166-0193
Tel +1 212.351.2338 • Fax +1 212.716.0839
KDominguez@gibsondunn.com • www.gibsondunn.com

From: Rena Andoh <RAndoh@sheppardmullin.com>

Sent: Monday, April 11, 2022 4:30 PM

To: Dominguez, Kate <KDominguez@gibsondunn.com>; Goeke, Justine <JGoeke@gibsondunn.com>; Polka, Michael M. <MPolka@gibsondunn.com>; Krevitt, Josh <JKrevitt@gibsondunn.com>; Kaounis, Angelique <AKaounis@gibsondunn.com>; tflynn@harrisbeach.com

Cc: Travis Anderson <TAnderson@sheppardmullin.com>; Lai Yip <LYip@sheppardmullin.com>; Kazim Naqvi <KNaqvi@sheppardmullin.com>; Robert J. Fluskey <RFluskey@hodgsonruss.com>; Melissa N. Subjeck <MSubjeck@hodgsonruss.com>; Pauline T. Muto <pmuto@hodgsonruss.com>

Subject: Moog vs. Skyrise, et al

[WARNING: External Email]

Kate,

I'm following up from the conference on Friday on several matters.

First, Josh told Judge McCarthy that you were going to provide us with full and transparent information regarding all of our bullet points under the third enumerated request for relief contained on page 7 of our April 7 letter to the Court. We ask that you provide all of this information no later than close of business Wednesday so that we have sufficient time to meet and confer prior to our April 19 joint submission deadline.

Further to Josh's point on transparency, as a follow up to our meet and confer on Friday at noon, and as part of your additional information regarding your compliance with the Stipulated Order, we would like to know how you ran the search term "Moog" across Skyrise's systems. For example, did you run the term with a wildcard, or as a full word search only? We would also like the file names of the 100 or so hits that you referenced as soon as possible so that we can review them.

Next, with respect to the AEO provision, my understanding is that you rejected our proposal, by which any identified deponent would have access to view and review AEO materials that they were an author, sender or recipient of at their counsels' offices for a period of 72 hours prior to deposition. We believe that addresses your only stated concern with respect to viewing AEO materials, namely that you wanted to be able to prepare witnesses for deposition. Assuming that I am correct that you rejected our proposal, please provide a counterproposal as quickly as possible so that we don't lose more time prior to the April 19 deadline.

Finally, we will respond to you under separate cover in more detail regarding the forensic protocol. As you know, both from our meet and confer and Lai's email to iDiscovery, your proposal has no relationship to what we agreed to in the Stipulated Order and is a total nonstarter.

We are available to meet and confer on all of these issues.

Regards,
Rena

Rena Andoh

[+1 212-634-3092](tel:+12126343092) | direct
RAndoh@sheppardmullin.com | [Bio](#)

SheppardMullin

[30 Rockefeller Plaza](#)
[New York, NY 10112-0015](#)
[+1 212-653-8700](tel:+12126538700) | main
www.sheppardmullin.com | [LinkedIn](#) | [Twitter](#)

Attention: This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments.

This message may contain confidential and privileged information for the sole use of the intended recipient. Any review, disclosure, distribution by others or forwarding without express permission is strictly prohibited. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

Please see our website at <https://www.gibsondunn.com/> for information regarding the firm and/or our privacy policy.

This message may contain confidential and privileged information for the sole use of the intended recipient. Any review, disclosure, distribution by others or forwarding without express permission is strictly prohibited. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

Please see our website at <https://www.gibsondunn.com/> for information regarding the firm and/or our privacy policy.

This message may contain confidential and privileged information for the sole use of the intended recipient. Any review, disclosure, distribution by others or forwarding without express permission is strictly prohibited. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

Please see our website at <https://www.gibsondunn.com/> for information regarding the firm and/or our privacy policy.
